Jeffrey N. Pomerantz, Esq. Andrew W. Caine, Esq. (admitted *pro hac vice*)

PACHULSKI STANG ZIEHL & JONES LLP 10100 Santa Monica Boulevard, 13th Floor Los Angeles, California 90067-4100

Telephone: (310) 277-6910 Telecopy: (310) 201-0760

Counsel for the Circuit City Stores, Inc. Liquidating Trust

Lynn L. Tavenner, Esq. (VA Bar No. 30083) Paula S. Beran, Esq. (VA Bar No. 34679) TAVENNER & BERAN, PLC 20 North Eighth Street, 2nd Floor

Richmond, Virginia 23219 Telephone: (804) 783-8300 Telecopy: (804) 783-0178

Counsel for the Circuit City Stores, Inc.

Liquidating Trust

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re: : Chapter 11

CIRCUIT CITY STORES, INC., et al., Case No. 08-35653-KRH

Debtors.

(Jointly Administered)

NOTICE OF (A) MOTION FOR ENTRY ORDER (I) REQUIRING THAT CERTAIN DOCUMENTS BE FILED UNDER SEAL AND (II) PROVIDING FOR PROCEDURES PROTECTING CONFIDENTIAL INFORMATION AND MEMORANDUM IN SUPPORT THEREOF AND (B) HEARING THEREON

PLEASE TAKE NOTICE THAT the Circuit City Stores, Inc. Liquidating Trust (the "Trust"), through its Trustee, Alfred H. Siegel has filed the following with the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Court"), a copy of which is simultaneously being served upon you:

Motion For Entry Of An Order (I) Requiring That Certain Documents Be Filed Under Seal And (II) Providing For Procedures Protecting Confidential Information And Memorandum In Support Thereof (the "Motion");

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not

_

The Debtors in these Chapter 11 Cases, along with the last four digits of their respective federal tax identifications numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The current address for these entities is 200 Westgate Parkway, Suite 100, Richmond, VA 23233.

have an attorney, you may wish to consult one). Under the Case Management Order (as defined hereafter) and Local Bankruptcy Rule 9013-1, unless a written response to the Motion is filed with the Clerk of Court and served on the moving party within seven (7) days before the scheduled hearing date, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order(s) granting the relief requested.

PLEASE TAKE FURTHER NOTICE THAT in connection with the Debtors' Chapter 11 Cases, a Supplemental Order Establishing Certain Notice, Case Management and Administrative Procedures [Docket No. 6208] (the "Case Management Order") was entered by the Court on December 30, 2009, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained from the undersigned or for a fee via PACER at http://www.vaeb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that on **January 13, 2016 at 2:00 p.m**. (or such time thereafter as the matter may be heard) the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219, and will move the Court for entry of an order(s) approving the Motion.

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on either of the Motion, then within seven (7) days before the hearing date you or your attorney must:

File with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order. You must mail or otherwise file it early enough to the Court will **receive** it on or before the due date identified herein.

Clerk of the Court United States Bankruptcy Court 701 E. Broad Street, Suite 4000 Richmond, VA 23219

You must also serve a copy on:

Lynn L. Tavenner Tavenner & Beran, PLC 20 North Eighth Street, 2nd Floor Richmond, Virginia 23219

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Dated: December 18, 2015

/s/ Lynn L. Tavenner

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
TAVENNER & BERAN, P.L.C.
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: 804-783-8300
Facsimile: 804-783-0178

Email: ltavenner@tb-lawfirm.com pberan@tb-lawfirm.com

-and-

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Blvd., 13th Floor
Los Angeles, California 90067-4100
Telephone: 310-277-6910
Facsimile: 310-201-0760
E-mail:jpomerantz@pszjlaw.com
acaine@pszjlaw.com

Counsel for the Circuit City Stores, Inc. Liquidating Trust